

Good morning, my name is Robert Teitel and I'm a resident of West Bloomfield and the co-founder of Iron Laboratories in Walled Lake.

Ladies and Gentlemen of the committee, thank you for allowing me to speak before you this morning. I would like to introduce my colleague Claire Moore, who is a plant biologist at Iron Labs, and Iron Laboratories' counsel, John VanOphem. Ms. Moore is attending to answer questions pertaining to the science behind testing.

IRON Laboratories' mission is to provide knowledge for the benefit of patients, caregivers, and producers under Michigan's Medical Marihuana Act. We combine ongoing research and development with scientific expertise to provide accurate, consistent and reliable information about the medicines typically requested by a provisioning center.

The voters of the State of Michigan voted to legalize medical marihuana in 2008 and we quickly discovered that people were using medicine that was not tested, so, in 2011, we founded Iron Laboratories, which now has over 1,000 clients and has tested over 30,000 samples.

We have reviewed the House Bill 4209 and are in full support of the testing and tracking requirements. From our experience, we believe that the current legislation and, in particular, House Bill 4209 (previously HB4271) will provide the people of the State of Michigan much needed clarity and direction while giving greater predictability and protections for patients, caregivers and the businesses that are critical to providing medical marihuana products. We believe that implementation of the details of the testing create a clear requirement and will appropriately leave the implementation of regulations for safety compliance facilities with the other state agencies already handling similar responsibilities.

I would like to address the testing component. As with any medicine, it's vital that it undergo extensive and definitive testing and we utilize proven procedures like Gas Chromatography (GC), High Pressure Liquid Chromatography (HPLC), Mass spectrometry, and more to give our scientists the ability to generate comprehensive reports for not only dispensaries and caregivers, but for the patients. Through these tests, IRON Laboratories can report not just the potency of THC and other Cannabinoids, but the details of the types and amounts that help determine the treatments of many different types of ailments.

Some of the most important tests IRON Laboratories runs relate to insuring the quality and safety of the medicinal marihuana product. IRON Laboratories can test for the presence of potentially harmful molds, residual solvents, pesticides, and other contaminants. As the committee heard last month, the importance of testing for determining all of the attributes of a medicine sample gives patients critical peace of mind that their medicine is as described and, most importantly, safe.

IRON Laboratories applies these same extensive testing and characterizing procedures to all forms of medicinal marihuana, including infused products. The testing reports may then be used to verify the potency profile and used in the accurate dosing of medicine for patients for insuring quality and safety.

I do want to address one point about THC potency. Contrary to some of the testimony you heard last week. Our data indicates that THC levels in usable marihuana edibles may generally range from about 45 to 90%, but our experience in testing indicates that in practice, it averages about 60%. Of course, the real point of this is not potency alone. That approach ignores the real life aspect of dosing. As you heard from several patients and caregivers last month, patients are already capable of making dosing decisions provided they have accurate, detailed information. Let me emphasize that IRON Laboratories has the ability today to test and report those required details for the safe and effective delivery of medicinal marihuana products.

We also understand that there may be some concern regarding the tracking of medicinal marihuana products during testing. Please be assured IRON Laboratories continues to implement and improve procedures and practices to exceed all tracking requirements to be mandated by the Bill. We have invested in the development of the required infrastructure for our lab to accurately and safely track all medicinal marihuana samples from pick up (cradle) to destruction (grave) and adhere to strict tracking, security, reporting and labeling requirements. Notably, we want to stress that IRON Laboratories finds that while significant investment is required, it is very possible to meet the current tracking and security requirements as a safety compliance facility as proposed under Bill 4209. More importantly, we consider these requirements critical for our clients to provide the required quality assurance of their medicinal marihuana products while providing our patients with informative reports and labels for medicine bottles and access to detailed information regarding the potency and confirmed cannabinoid strain profiles.

In closing, I would like to note that IRON Laboratories has previously hosted some of the committee members and a number of your legislative colleagues at our facility and we would like to extend the same invitation to all of the committee members to tour our facility and continue to collaborate to insure that Michigan and, most importantly, patients have the safest, most effective medicinal marihuana products while meeting or exceeding all legal and regulatory requirements including those set forth in House Bill 4209.

Again, thank you for allowing me to testify today and I welcome your questions.